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| Attorney or Party Name, Address, Telephone & FAX<br>Nos., State Bar No. & Email Address<br>Kurt Ramlo (SBN 166856)<br>RAMLO LAW<br>15021 Ventura Blvd. #544<br>Los Angeles, CA 91403<br>RamloLegal@gmail.com | FOR COURT USE ONLY   |
| <input type="checkbox"/> Debtor(s) appearing without an attorney<br><input checked="" type="checkbox"/> Attorney for: Foreign Reps. to Golden Sphinx Limited   |  |
| <b>UNITED STATES BANKRUPTCY COURT<br/>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>  |  |
| In re:<br><br>Aleksandr Vitalievich Sabadash   | CASE NO.: 2:23-bk-15574-NB<br>CHAPTER: 15  |
|  | <b>NOTICE OF MOTION FOR ORDER<br/>WITHOUT A HEARING</b><br><br><b>[LBR 9013-1(p) or (q)]</b> |
| Debtor(s).   | [No hearing required]  |

**TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:**

Andrew Wood and Alexander Adam, in their capacities as the joint liquidators and authorized foreign

- Movant(s) representatives of Golden Sphinx Limited,  
filed a motion or application (Motion) entitled Application of Non-Resident Attorney to Appear Pro Hac Vice in a  
Specific Bankruptcy Case and/or Adversary Proceeding(s).
- Movant(s) requests that the court grant the motion without a hearing as provided for in:  
☐ LBR 9013-1(p), which, in addition to notice via Notice of Electronic Filing, requires the motion to be served on  
additional parties as specified in LBR \_\_\_\_\_; or  
☒ LBR 9013-1(q), which requires service of the motion only on parties via Notice of Electronic Filing.
- The motion is based upon the legal and factual grounds set forth in the motion. (*Check appropriate box below*):  
☐ The full motion is attached to this notice; or  
☒ The full motion was filed with the court as docket entry #143, and a detailed description of the relief sought  
is \*NOT\* attached to this notice \*AS THE MOTION WAS SERVED VIA NEF ON ALL PARTIES\*.

4. Movant will promptly lodge an order that the court may use to rule on the motion, as the court may rule on the motion without a hearing and without an opportunity for any party to file a request for a hearing..

Respectfully submitted,

Date: 12/12/2025

/s/ Kurt Ramlo

Signature of Movant or attorney for Movant

Kurt Ramlo

Printed name of Movant or attorney for Movant

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15021 Ventura Blvd. #544, Sherman Oaks, CA 90034.

A true and correct copy of the foregoing document entitled

### Notice of Motion for Order Without a Hearing

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 12, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Schuyler Carroll** SCarroll@manatt.com, lduong@manatt.com
- **Benjamin R King** bking@loeb.com, karnote@loeb.com; ladocket@loeb.com; bking@ecf.courtdrive.com
- **Dare Law** dare.law@usdoj.gov
- **Daniel J McCarthy** dmccarthy@hillfarrer.com, spadilla@hillfarrer.com; dflowers@hfbllp.com
- **Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
- **Oleg Stolyar** astolyar@loeb.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Noah Weingarten** nweingarten@loeb.com, astolyar@loeb.com; fmckeown@loeb.com
- **Michael Zorkin** mz@thezorkinfirm.com

**2. SERVED BY UNITED STATES MAIL:** On **December 12, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 12, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

December 12, 2025

Kurt Ramlo

/s/ Kurt Ramlo

Date

Type Name

Signature